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charge and dissolution are effected by operation of law and should afford but a personal defense to the debtor.

TAXATION — PROPERTY SUBJECT TO TAXATION — FOREIGN-OWNED CARS ENGAGED IN INTERSTATE COMMERCE. — A state tax was levied on tank cars owned by a foreign manufacturing corporation and used in the state in distribution of the corporation's products in interstate business. None of the cars were used in the state exclusively. *Held*, that the tax is valid. *Vera Chemical Co.* v. *State*, 102 Atl. 463 (N. H.).

A state tax on the privilege of operating foreign cars engaged in interstate traffic within the state is invalid as an unlawful interference with interstate commerce. *Pickard* v. *Car Co.*, 117 U. S. 34. But the fact that property is used in interstate commerce does not render it immune from its fair share of the burdens of government. *Pullman's Palace Car Co.* v. *Pennsylvania*, 141 U. S. 18. The tax in the present case is a tax on property, and the difficulty of an interference with interstate commerce is not presented. But a property tax can be imposed only on property having a permanent *situs* within the territory of the sovereign imposing it. *Hays* v. *Pacific Mail Steamship Co.*, 17 How. (U. S.) 596. No particular car here had a permanent *situs* in the taxing state, and if the tax was levied arbitrarily on such cars as happened to be in the state at the date of the tax levy, the case is quite unsupportable. But if the tax was levied on the average number of cars always in the state, it can be justified as a tax on a constant aggregate of shifting units. *American Refrigerator Transit Co.* v. *Hall*, 174 U. S. 70. The case is not clear on this point.

TORTS — UNUSUAL CASES OF TORT LIABILITY — ACTION FOR INDUCING BREACH OF CONTRACT TO MARRY. — The complaint alleged that the defendants induced plaintiff's fiancé to break his engagement with her by threatening to have him placed in a sanitarium and by making false statements as to plaintiff's character. The defendant demurred. *Held*, that plaintiff had no cause of action. *Homan* v. *Hall*, 165 N. W. 881 (Neb.).

The cause of action for slander was barred by the statute of limitations, which is one year for libel and slander and four for other torts. See 1909, NEB. ANN. STAT., §§ 1012, 1014, 1015. But it is a general rule that an action will lie for interference with contract rights. *Bowen* v. *Hall*, 6 Q. B. D. 333; *Morgan* v. *Andrews*, 107 Mich. 33, 64 N. W. 869. See William Schofield, "Principle of Lumley *v.* Gye," 2 HARV. L. REV. 19, 23. See also 16 HARV. L. REV. 299. Even vaguer rights, such as the right to an expectancy or to free business relations, have been protected. *Kelly* v. *Kelly*, 10 La. Ann. 622; *Lewis* v. *Bloede*, 202 Fed. 7; *Tarleton* v. *Magawley*, Peake 205. The principal case would seem to be no exception on principle, and as the allegations of the complaint negative any possible defense of privilege the decision seems difficult to support. Only one analogous case has been found. *Leonard* v. *Whetstone*, 34 Ind. App. 383, 68 N. E. 197. This is in accord with the principal case and like it is based on a statement of Judge Cooley, made in the discussion of another subject and supported by no authority. See COOLEY, TORTS, 2 ed., 277.

TRADE-MARKS AND TRADE NAMES — PROTECTION APART FROM STATUTE — EFFECT OF FRAUDULENT ADVERTISING BY PLAINTIFF ON RIGHT TO INJUNCTION. — Defendant was using the name of plaintiff's vaudeville act for her own act. Plaintiff's act claimed to be an exhibition of thought transference, but was really only a trick. In his advertising plaintiff had published a false account of his life. Plaintiff asks for an injunction. *Held*, the injunction should be refused. *Howard* v. *Lovett*, 165 N. W. 634 (Mich.).

For discussion of this case, see Notes, page 889.